

AO 91 (Rev. 11/11) Criminal Complaint

FILED**UNITED STATES DISTRICT COURT**

for the

Western District of Texas

February 13, 2024

CLERK, U.S. DISTRICT COURT
WESTERN DISTRICT OF TEXASBY: EP
DEPUTY

United States of America)

v.)

Wladimir VERA-Villamizar)

Case No. EP:24-M-00652-LS)

*Defendant(s)***CRIMINAL COMPLAINT**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.


On or about the date(s) of February 5, 2024 in the county of El Paso in the
Western District of Texas, the defendant(s) violated:*Code Section*

8 U.S.C. 1325(a)(1)

Offense Description

being an alien to the United States, knowingly enter and attempt to enter the United States at a time and place other than as designated by immigration officers.

This criminal complaint is based on these facts:

☒ Continued on the attached sheet.Complaint sworn to telephonically on
February 13, 2024 at 09:16 AM and signed
electronically. **FED.R.CRIM.P. 4.1(b)(2)(A)**
~~Sworn to before me and signed in my presence.~~Date: 02/13/2024City and state: El Paso, Texas
*Complainant's signature*David R. Valles, Border Patrol Agent
Printed name and title
*Judge's signature*Leon Schydlower U.S. Magistrate Judge
Printed name and title

Affidavit

The DEFENDANT, Wladimir VERA-Villamizar, an alien to the United States and a citizen of Venezuela, illegally entered the United States from the Republic of Mexico on February 5, 2024, by crossing the Rio Grande River approximately 3.89 miles east of the Bridge of the Americas Port of Entry in El Paso, Texas, in the Western District of Texas. The place where the DEFENDANT entered is not designated as a port of entry by immigration officers.

The DEFENDANT was detained on an administrative immigration violation by United States Border Patrol Agents on February 5, 2024, and transferred to the El Paso Sector Hardened Facility for detention and processing. Due to the mass influx of immigrants in detention, on February 12, 2024, the DEFENDANT was determined to be amenable to 8 USC 1325, entry without inspection at a time or place other than a designated port of entry.